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March 22, 2018

BY ECF

Honorable Henry B. Pitman
United States District Court
Southern District of New York
500 Pearl Street,
New York, New York 10007

Re: Loore Peri v. City of New York, et al.,
15-CV-3683 (HBP)

Your Honor:

I am a Deputy Chief in the Special Federal Litigation Division of the New York City Law Department. For the reasons set forth below, defendants City of New York, Richard Carpenter and Adam Valerio respectfully request an adjournment of the settlement conference currently scheduled for tomorrow, March 23, 2018 at 9:30 a.m., to a date and time convenient to the Court after April 7, 2018. I have this afternoon tried to contact plaintiff's counsel, Brett Klein, to procure his consent to this request; however, the call to Mr. Klein's office went straight into voice mail and I was unable to leave a message on his cell phone. As such, I was unable to procure Mr. Klein's consent to this request. Thus, given the time issues related to this request, this request is submitted without Mr. Klein's input. Upon information and belief, this is defendants' first request to adjourn the settlement conference.

As an initial matter, the undersigned apologizes to both the Court and plaintiff's counsel for the late submission of this request. However, the reason why the adjournment is requested is the very reason for the late submission. More specifically, the ACC who was previously defending this matter very recently and abruptly left the employ of the Law Department. This afternoon, as I was reviewing the cases that had been handled by the former ACC, I learned of tomorrow's settlement conference. This office is now in the process of re-assigning this and other matters. As it will take some time for the new defense attorney to familiarize themselves with this matter, it is respectfully requested that the settlement conference be adjourned to a date convenient for the Court after April 7, 2018. This adjournment will give the incoming defense counsel the opportunity to become familiar with the case and meaningfully participate in the settlement conference.

In light of the foregoing reasons, defendants respectfully request an adjournment of the settlement conference currently scheduled on March 23, 2018 at 9:30 a.m. until a date and time convenient to the Court after April 7, 2018.

Thank you for your consideration herein.

Respectfully submitted,

/s/

Elizabeth Dollin
Deputy Chief

cc via ECF: Brett Klein, Esq.